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July 29, 2021

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Gursewak Singh v Lintech Electric Inc., et al
United States District Court EDNY 18 CV5780

Dear Magistrate Judge Bloom:

I write as plaintiff's attorney to seek the following relief:

1) to lift the stay in effect;

2) Upon that relief being granted, having the Court decide the plaintiff's Second Motion for the discovery dated October 20, 2020 (Docket 90) to compel defendant to appear as previously Ordered, to seek sanctions and other relief.

Magistrate Judge Gold. on September 22, 2020 Ordered (Docket 88) that discovery was to proceed as follows:

9/22/2020

88 Minute Entry: Telephone Conference held on 9/22/2020 before Magistrate Judge Steven M. Gold. Silver for plaintiff, Mizrahi for defendants. Plaintiff will respond to defendants' discovery demands by October 5, 2020. **Defendant will be deposed on October 12, 2020, and plaintiff will be deposed on October 21, 2020. Non-party Talico will be deposed by December 1, 2020, and**

discovery will close by December 15, 2020. THE PARTIES WILL SUBMIT A JOINT LETTER TO THE COURT BY DECEMBER 22, 2020, reporting on whether there is any additional discovery to complete, whether either party anticipates moving for summary judgment, and whether a referral to court-annexed mediation might be productive. If not, counsel shall propose a schedule for preparing a joint pretrial order. (FTR Log #12:15-12:46.) (Gillespie, Saudia) (Entered: 09/22/2020)

Defendants did not show on October 12, 2020 as directed by the Court and as agreed to by the parties.

Nor did they show up to be deposed on the next date of October 20, 2021 once again agreed to by counsel.

Instead, on October 19, 2020 defendant's counsel served DEFENDANT'S RESPONSES & OBJECTION STO (SIC) PLAINTIFF'S NOTICE ON DEPOSITION (Docket 90-1).

The defendants refusal to have appeared to be deposed and their "OBJECTIONS" raised are seemingly frivolous and displayed purposeful efforts to stall and prevent discovery from proceeding.

That Second Motion was made on October 20, 2020 (Docket 90) and has yet to be decided.

All matters including that Second Motion were stayed by the Court (Docket 92) pending a Decision on defendants' motion for sanctions and other relief.

The schedule set by Magistrate Judge Gold should be reset upon the stay being lifted.

The application of defendants for attorneys fees, etc. is still pending and it should not be cause to now delay any further my client continuing with the prosecution of his claims.

This is the first motion made to lift the stay.

Respectfully submitted,



JONATHAN SILVER

JS/eb